



PAUL R. LEPAGE
GOVERNOR

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



AVERY T. DAY
ACTING COMMISSIONER

**The Dingley Press, LLC
Androscoggin County
Lisbon, Maine
A-506-70-O-A**

**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #1**

FINDINGS OF FACT

After review of the Part 70 License amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	The Dingley Press, LLC
LICENSE TYPE	Part 70 Minor License Modification
NAICS CODES	323110
NATURE OF BUSINESS	Commercial Lithographic Printing
FACILITY LOCATION	119 Lisbon St, Lisbon, Maine

The Dingley Press, LLC (Dingley) is a commercial lithographic printing facility consisting of four printing presses, ink-jet labeling operations, air handlers, and cold cleaning degreasers. The printing presses are controlled by either a regenerative thermal oxidizer or a catalytic oxidizer.

Dingley has requested a Part 70 Minor Modification to incorporate the pneumatic conveying systems associated with three existing lines of paper trim collection and baling equipment.

B. Emission Equipment

The following emission units are addressed by this Part 70 License Amendment:

Process Equipment

Equipment	Pollution Control Equipment
Trim Collection Systems (3)	Cyclones and Baghouses

C. Application Classification

A Part 70 Minor License Modification is for a license change that meets the following criteria:

- Does not violate any Applicable requirement;
- Does not involve a Part 70 Significant License Modification to existing monitoring, reporting, or recordkeeping requirements in the license;
- Does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impact or a visibility or increment analysis;
- Does not seek to establish or change a Part 70 license term or condition for which there is no corresponding underlying Applicable requirement, and that the source has assumed to avoid an Applicable requirement to which the source would otherwise be subject. Such terms and conditions include: A federally enforceable emissions cap assumed to avoid classification as a Title I modification or a modification or reconstruction under any provision of Section 111, or 112 of the Clean Air Act (CAA); and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the CAA;
- Is not a Title I modification or a modification or reconstruction under any provision of Section 111 or 112 of the CAA, and
- Is not required by the Department to be processed under Part 70 Significant License Modification procedures.

The request to include the pneumatic conveying systems in the facility's license is not a Part 70 Significant License Modification. The facility is not proposing substantial changes to existing monitoring and testing requirements, nor is it proposing the relaxation of existing license conditions (definition of Part 70 Significant Modification).

The facility's request is classified as a Part 70 Minor License Modification and has been processed under *Part 70 Air Emission License Regulations*, 06-096 Code of Maine Rules (CMR) 140 (as amended).

II. BEST PRACTICAL TREATMENT (BPT) AND EMISSION STANDARDS

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emission from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. Trim Collection Systems

Dingley operates three separate pneumatic conveying systems for the collection and handling of waste paper throughout the facility.

Trim Collection System #1 and Trim Collection System #2 collect trimmings from bindery lines utilizing material handling blowers via ductwork. Trim Collection System #3 collects and shreds bulk waste from the press lines as well as waste from the bindery lines which may incorporate spine glue. The paper from all three lines is separated from the air stream using dedicated cyclones and baled.

The air stream from Trim Collection System #1 is vented to the atmosphere directly from the cyclone exhaust. Exhaust from the cyclones associated with Trim Collection System #2 and Trim Collection System #3 is predominantly routed through small baghouses that exhaust within the building for heat recovery. There are five baghouses associated with Trim Collection System #2 and six baghouses associated with Trim Collection System #3.

Periodically each baghouse goes through a cleaning cycle that agitates the bags and drops the collected dust into a storage bin. When this occurs, the associated cyclone bypasses the baghouses and is vented to atmosphere through the building roof.

1. Emission Limits and Streamlining

For the trim collection systems, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of

the standards has been requested, and the applicable emission limits can be found below.

Pollutant	Applicable Emission Standards	Origin and Authority	Licensed Emission Limits
Visible Emissions (when venting to atmosphere)	20% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block avg in a 1-hr period	06-096 CMR 101, §2(B)(3)(d)	10% opacity on a six (6) minute block average basis*
	10% opacity on a six (6) minute block average basis	06-096 CMR 140, BPT	

Table Notes: * streamlining requested

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this source:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards; and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-506-70-O-A pursuant to 06-096 CMR 140 and the preconstruction permitting requirements of 06-096 CMR 115 and subject to the conditions found in Air Emission License A-506-70-M-R/A and in the following conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in 06-096 CMR 115 for making such changes and pursuant to the applicable requirements in 06-096 CMR 140.

For each specific condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only.**

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

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The following are New Conditions:

(30) Trim Collection Systems

Visible emissions from the exhaust on the Trim Collection Systems shall not exceed an opacity of 10% on a six (6) minute block average basis.
[06-096 CMR 140, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS 14 DAY OF September, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Corne for
AVERY T. DAY, ACTING COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-506-70-M-R/A.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 8/10/15

Date of application acceptance: 8/10/15

Date filed with the Board of Environmental Protection:

This Order prepared by Lynn Muzzey, Bureau of Air Quality.

